REMARKS

The Official Action objects to the form of claim 13, which has been amended as to form. Reconsideration and withdrawal of the objection are respectfully requested.

Claims 1-8 were rejected as unpatentable over WIZIG 6,735,569 in view of IKEBATA et al. EP 0 895 750 A2 and claims 3 and 9-12 were rejected further in view of BROOKNER 6,256,616. Claims 1-3, 5-6 and 8-12 have been canceled and claims 4 and 7 have been amended to depend from claim 13. Accordingly, withdrawal of the rejection is respectfully requested.

Claim 13 was rejected as unpatentable over WIZIG in view of BROOKNER. Reconsideration and withdrawal of the rejection are respectfully requested.

Claim 13 defines a method in which a database is provided with two data groups; namely a first (biometric) group and a second (informational) group. The central server seeking to identify a user randomly selects one of the biometric features from the first group and randomly selects a further one of the features from the first and second groups. The combination of references does not disclose a database with these two groups of data that are employed in this way and thus claim 13 would not be obvious to one of skill in the art.

WIZIG discloses a healthcare system with plural databases. The Official Action acknowledges that none of the databases includes two groups of data where one of the groups

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includes the biometric data in the first group of claim 13.

Figure 10 of WIZIG shows one database that includes the type of

information in the second group of claim 13. The Official Action

also acknowledges that WIZIG does not disclose the random

selection feature of claim 13.

The Official Action relies on BROOKNER for the

suggestion to modify the WIZIG system to include the missing

features. BROOKNER discloses several embodiments of a user

identification system. In the embodiment of Figure 3, a user

provides a PIN and the system randomly selects an additional

piece of information for the user to provide. The database from

which the random selection is made includes the type of

information in the second group of claim 13 (column 3, lines 38-

54). In the embodiment of Figure 4, the user is asked to provide

biometric information (column 4, lines 1-41). There is no

suggestion to use random selection in this embodiment, and

further there is no suggestion here to use the biometric

information with other information acquired from the user.

BROOKNER states that this embodiment "eliminates the present need

for a series of user commands…to validate the use of

franking/postage equipment." It is to be noted that the

embodiment of Figure 5 provides a more robust identification

system. In this embodiment (column 4, lines 42-61) there are

several checks. A first user input (S24) and first comparison

(S25) can be made using "textual, biometric, or another type of

data." If the result is satisfactory, the user is asked (S27) to provide a second input that may be "textual, biometric, or randomly selected in accordance with the present invention." If the comparison (S28) is satisfactory, access is permitted (S30).

As is apparent, BROOKNER regards biometric information (the type in the first group of claim 13) as being sufficiently secure so that there is no need for random selection of such data. In the embodiment of Figure 4, only biometric information is provided and there is no random selection. In the embodiment of Figure 5, biometric information may be provided once or twice, but there is no suggestion to randomly select this information.

Further, even in the more robust system of Figure 5 of BROOKNER there is no suggestion to perform two random selections as in claim 13. In BROOKNER, the random selection can occur in the second request for information as an alternative to the use of biometric information.

Further still, there is no suggestion in either reference to randomly select from the first group and randomly select again from a combination of the first and second groups. The invention of claim 13 provides a level of security that is, in effect, a multiple of two random selections that is not suggested by either reference. Moreover, this multiplier effect is achieved efficiently. Note that the method includes transmitting "a request for the randomly selected features" so as to avoid the delays inherent in the embodiment of Figure 5 of
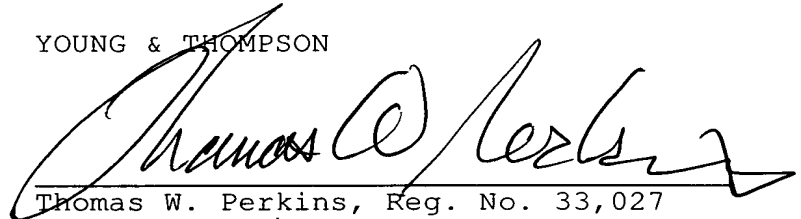
BROOKNER (in which separate requests are made). Accordingly, the present invention greatly enhances the security of an identification system in an efficient manner that is not envisioned by either reference.

In view of the present amendment and the foregoing remarks, it is believed that the present application has been placed in condition for allowance. Reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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